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Honorable \_\_\_\_\_  
Courthouse  
Street  
City, State

Dear Judge \_\_\_\_\_ :

Attached you will find an (18) page notarized copy of my *Amicus Brief in opposition to interviewing children regarding their opinions and feelings with respect to parenting arrangements; their residential preference; the structuring of their relationship with either or both parents, including but not limited to, the parenting schedule; or regarding any parental disagreement regarding them.* To that end, this Amicus Brief is intended to educate the Court with the most current, clinically and scientifically accepted, knowledge about the psychological, cognitive, and interpersonal needs of children who are experiencing parental separation.

I make the explicit point that I have not reviewed nor am aware of the specifics of this case; have not interviewed or evaluated the litigants or the child/children in this case; nor do I support one party over the other, as I have not undertaken an evaluation to determine the family dynamics or other pertinent issues impacting the child/children. I will address, instead, the commonly occurring clinical issues that pertain to the situation of parental separation, its effects on children, and the factors that affect and promote the best interests of the child. I trust the information herein documented will be useful to the Court in the rendering of its rulings on the case.

My expertise in educating the Court about such matters is based upon my history of more than four (4) decades of professional education, training, and work in evaluating and/or treating children and their families *and* based upon my specialization in working for more than twenty (20) of those years

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with children experiencing their parents' highly adversarial custody battles. I trust that my statements will carry weight in Your Honorable Court.

Should at the time of the hearing I need to be directly contacted for any clarification or confirmation, my office phone number is (631) 707-0174, and I would be more than happy to telephonically or by other teleconference means, under Oath, opine about relevant questions Your Honor would require of me.

Finally, I declare that I was neither compensated nor otherwise received any monetary benefits for writing this Brief.

Respectfully signed and submitted for the case of *Plaintiff v Defendant*

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Linda J. Gottlieb, LMFT, LCSW-R  
*Licensed Marriage & Family Therapist, Licensed Clinical Social Worker,  
Public Speaker, and Author*  
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BEFORE ME, the undersigned Notary Public, on this day personally appeared LINDA J. GOTTLIEB, who being by me duly sworn, on her oath deposed and said that she is an amicus curiae in the above entitled and numbered cause; that she has read the above and foregoing amicus brief, and that every statement contained therein is within her personal knowledge and is true and correct.

SUBSCRIBED AND SWORN TO BEFORE ME, on this the \_\_\_\_\_ day of \_\_\_\_\_, 2016 by Linda J. Gottlieb, LMFT, LCSW-R.

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NOTARY PUBLIC, STATE OF NEW YORK

**Case NO:**

Plaintiff v Defendant

**AMICUS BRIEF IN OPPOSITION TO INTERVIEWING CHILDREN ABOUT  
ISSUES RELATED TO PARENTAL CONFLICT AND OTHER ISSUES OF  
SEPARATION AND DIVORCE**

Honorable \_\_\_\_\_  
Court House  
Street  
City, State

**Declaration of Linda J. Gottlieb, LMFT, LCSW-R**

Dear Judge \_\_\_\_\_:

My name is Linda J. Gottlieb, LMFT, LCSW-R, and I am writing this Amicus Brief in opposition to the customary practice of interviewing children to determine—and often be bound by—their wishes about residential preference, parenting time with the non-residential parent, and about their relationships with each of their parents. I have taken this position because I have determined that doing so is detrimental to their psychological and cognitive well being, inappropriately empowers them, anoints them with decision-making responsibility for which they do not have the reasoning ability to handle, and fails to account for any undue influence and suggestibility by one or both of their parents.

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I am opining about this based upon my forty-five (45) years of professional experience working with families and children, my initial twenty-four (24) years as a social worker and subsequently as an administrator in New York's foster care system; and afterwards, through the present time, as a family therapist currently in private practice—specifically focused on parents and children going through an adversarial parental separation and/or divorce proceeding.

Firstly, an important rationale that children not be permitted to make such momentous decisions, or to provide input into such decisions, is the same rationale that requires jury members to be at least 18 years of age: it is that the critical reasoning ability of children under the age of 18 is immature and underdeveloped. In fact, it is generally not until our early 20s that we have attained mature critical reasoning skills. Children, therefore, do not have the cognitive facility to evaluate what is in their best interests; to theorize what it would be like to have a parent marginalized, minimized—and, unfortunately, in some cases, eradicated from their lives at the orchestration of the other parent; or to be able to discriminate what is rational, truthful, meaningful, and moral amidst all the information they receive from their parents, other significant adults, peers, and from indiscriminate sources. Children lack wisdom!

Our knowledge about child development dictates that we do not delegate to children the responsibility for making momentous and complex decisions beyond their emotional and cognitive abilities to handle. We would not ask a child, "How often do you plan to attend school?" or "Are you willing to comply with medical treatment?" or "Have you determined your dietary habits?" "Would you consider relinquishing your use of illegal drugs?" How is it, then, that we so freely abrogate our professional and parental decision-making responsibility to a child in such a critical area as family relationships, specifically the relationship with a parent.

Secondly, children generally do not have the emotional capacity and wherewithal to contradict and defy a parent who is adversely influencing them. And when the influence is designed to turn the child against the other parent, it becomes a heinous and abusive tactic. Many professionals who work in the area of custody disputes have observed and written copiously

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about the undue influence of some parents who are determined to sever the relationship between the other parent and their child. One such professional is Christopher Barden, psychologist and a lawyer who graduated with honors from Harvard Law School. Barden, Ph.D., J.D., states, “There can be no credible controversy about the power of parents to influence children.”

Specifically in cases that have reached the point of an adversarial court proceeding, it is frequently impossible to distinguish the child's expressions and true feelings from those of a parent who is engaging in strategies designed to turn the child against the other parent.

I have repeatedly experienced—in my work with more than 550 children of high conflict parental separation and/or divorce—the high frequency of such manipulation of the child by one parent. And I have observed that the child will invariably mimic the beliefs, feelings, and wishes of a parent who abuses her/his parental authority to thusly program the child to reject the other parent. We should not expect otherwise because children are so dependent upon a parent—particularly a residential parent. It should be noted however, that, although non-residential parents also engage in alienating strategies, it occurs to a much lesser degree because access to the child is the environment that nurtures the alienation process. A pertinent reference to the research that addresses the pervasiveness of this process is documented in the 2013 book entitled, *Children Held Hostage: Dealing with Programmed and Brainwashed Children*, written by Clawar and Rivlin and published by the American Bar Association. The authors followed 1000 children for 12 years and reached the finding that some degree of alienation occurs in 80% of all divorces.

Regrettably, in adversarial cases involving alienation, children are often not protected from adult issues and conflicts. They are frequently exposed, either directly or indirectly, to parental hostilities, the legal documents, and to the claims put forth in the legal proceedings—claims that can be frivolous and malicious about one of the parents. I cited numerous such examples of this in my 2012 book, *The Parental Alienation Syndrome: A Family Therapy and Collaborative Systems Approach to Amelioration*.

Thirdly, children of adversarial parental conflict and hostilities involving alienation are irrepressibly caught—being trapped by their

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genuine feelings but which are confronted head on by their situation. On the one hand, they love and crave their relationships with both parents; but on the other hand, they are thrust into the horrific situation whereby one parent is manipulating them to choose that parent as the residential parent—often at the expense of total rejection of their other parent. Children *do not* welcome such a choice—an assumption we make when we decide to inquire of them about their wishes and feelings in this matter. Children are actually terrified by being asked to choose between parents—because that is how the situation is usually presented to them or is, at least, perceived by them as such. The professionals who impact parenting schedules and responsibilities must release children from their trap by relieving them from making decisions about residential custody and parenting time with the non-residential parent. We must assume the responsibility for which we were charged by our respective professions: guaranteeing a child's right to a meaningful relationship with both parents—assuming both parents are fit.

By anointing children with the power to choose, the result is a double bind—no win—catch 22 situation for these children. This situation has led to numerous, documented psychotic outcomes for the child. Putting the child in the middle of parental conflicts has been well documented since the 1950s by the child psychiatrists who later founded the family therapy movement. These psychiatrists observed their psychotic child patients on the psychiatric ward during visits with their families when one parent would request the child's allegiance in that parent's battle with the other parent to belittle and marginalize the other parent. The child had no good outcome resolution to the co-opting parent's request because the relationship with one of the parents would be severed: either the child joined with the co-opting parent to reject the other parent or the co-opting parent would likely reject the child for failure to join the coalition. And that is exactly a cause of psychosis: when there are no good options to resolve a problem. Indeed, child psychiatrist Murray Bowen labeled this family dynamic the “pathological triangle.” And, in fact, Bowen was so convinced about the parent's cause and maintenance of the child's symptoms that when he hospitalized the child, he actually hospitalized the entire nuclear family.

I have experienced in my practice such severe detrimental effects to children resulting from the triangulation process in which one parent has co-

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opted the child to reject the other parent. We must therefore be suspicious of a situation in which a child rejects a parent for no justifiable reason, and then we must be prepared to initiate swift and appropriate interventions to reverse the process.

Fourthly, should the child comprehend—generally not until adulthood—that she or he had unjustifiably rejected and maltreated a parent, she or he will likely suffer a lifetime of guilt. And if the rejected parent is no longer living or available when the child reaches this understanding, it is impossible to make amends and thereby assuage the child’s devastating guilt.

Fifthly, we need to consider how unhealthy it is for a child to linger with anger for a parent. Time and again children are sent into therapy at the suggestions of their schools to address anger issues expressed in the classroom; parents voluntarily bring their child to therapy when anger is inappropriately handled with peers; and judges repeatedly order that juvenile offenders obtain help to mitigate their anger. So why would we permit a child to maintain with anger for a parent—who is so meaningful and irreplaceable to a child? In my professional opinion, we will merely be waiting for the smoking gun if we allow a child to remain with unresolved anger and hostility for a parent. And to state the obvious, the anger can be resolved only in interaction with the rejected parent. It certainly cannot be resolved by permitting the severing of the relationship between the parent and the child.

Sixthly, it is anti-instinctual for a child to hate and reject a parent. In my work with 3000 abused and/or neglected children in foster care, I discovered that it was a rare child indeed who resisted visiting with her/his biological parents. To the contrary, these children craved contact with their parents, were protective of them, and aligned with them. My professional experience working with this population has led me to conclude that the instinct to love and need a parent is so strong that it is superseded only by the instinct for survival and the instinct to protect one’s young. Indeed, due to our long childhood dependency, the need for a parent is a survival instinct. It is therefore in the genes. Were it not, the human species would have likely become extinct in the first generation. It is therefore not in the child’s best interest to accede to the expressed—but not genuine—wish to reject a

parent.

Seventhly, I have repeatedly experienced children who had rejected contact with a parent suddenly flip as quickly as a light switch from rejection to enthusiastically embracing that parent as soon the contact was imposed upon them by an outside authority such as the Court or should the favored parent release them from their trap by now supporting their child's relationship with the rejected parent. The rapidity with which these children flip their emotions is an indication of the spuriousness of their expressed enmity for and rejection of a parent.

### **Research that has informed my professional opinions regarding the Suggestibility of Children to Adult and Parental Influence**

When evaluating a child's behaviors, feelings, and beliefs in an adversarial parental battle, it is necessary to evaluate any undue influence that each parent holds over the child. In particularly hostile cases, it is crucial to identify and evaluate the effects of the extraordinary control over a child that a parent may exert if that parent's goal is to undermine the relationship between the child and the other parent.

Again quoting Barden, he cautioned the professionals who intervene in such adversarial proceedings that they have a "critical obligation to carefully review the influence of parents, therapists or other adults on the attitudes, beliefs and memories of children." (p. 420)

My mentor, child psychiatrist Salvador Minuchin, invoked a telling metaphor for a child who is rigidly aligned with one parent in that parent's conflict with the other parent: to paraphrase Dr. Minuchin, he described the aligned child as a puppet who mouths the words of the ventriloquist, aligned parent.

Maggie Bruck and Stephen Ceci (1999) have extensively summarized the research on the suggestibility of children to adult influences. I am referencing here just a few of these research studies. One that they cited concluded that:

when children are repeatedly and suggestively interviewed about false events, assent rates rise for each interview. For example, children are more likely to assent to a false event in a third interview than in a second interview. (P. 426.)

Another study cited by Bruck and Ceci found that:

subtle suggestions can influence children's inaccurate reporting of nonevents that, if pushed in follow-up questioning by an interviewer who suspected something sexual had occurred, could lead to a sexual interpretation. (P. 430.)

Bruch and Ceci further emphasized that children can sound quite "credible" in their reporting of nonevents but which had been suggested by the interviewer. (P. 432.)

For additional, but hardly exhaustive, documentation on the suggestibility of children, please refer to the following citations listed in References at the end of this Brief: Bruck, M. & Ceci, S., 1999; Bruck, M., Ceci, S., & Hembrooke, H., 2002; Drivdahl, S. & Zaragoza, Maria, 2001; Loftus, E., 1997, 2000; Lepore, S. & SESCO, B., 1994; Mantle, G., Moules, T., Johnson, K., Leslie, J., Parsons, S., & Shaffer, 2007; Poole, D. & Lindsay, D. S., 1995, 1998.

The above research evaluated the suggestibility of children by *strangers*. Imagine how much more powerful and effective is the capability of a parent—upon whom a child is dependent and from whom the child requires sustained love and approval—to manipulate a child to adopt that parent's belief system. I can confirm the above research findings: my professional work with thousands of children confirms that they are readily suggestible by adults in general but are particularly vulnerable to parental influence and manipulation. Alienation specialists concur by overwhelming consensus that a parent who programs a child to demonize and reject the other parent is employing behaviors akin to the brainwashing of a cult member. (Baker & Fine, 2007; Clawar & Rivlin, 2013; Gottlieb, 2012, Bernet, 2010.) Indeed, in their updated edition of *Children Held Hostage*, in

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which the authors followed, for 12 years, 1000 children experiencing custody conflict, Clawar and Rivlin subtitled their book, *Identifying Brainwashed Children, Presenting a Case, and Crafting solutions*.

Let us consider a few comments that address the vulnerability of children to the programming of a parent.

Richard Warshak, Ph.D., in his 2003 article entitled, “Payoff and Pitfalls of Listening to Children,” cautioned about the vulnerability of children to adverse parental influence over their expressions of feelings and wishes. He declares:

Through a variety of tactics such as selective attention, repetition, intimidation, overindulgence, and suggestion, a parent can corrupt a child’s view of the other parent. Once a child forms a predominantly negative opinion of a parent, and particularly once this opinion is expressed publicly, it is liable to become deeply entrenched and highly resistant to modification even in the face of information that directly contradicts misconceptions. (P. 375.)

Warshak further alerts professionals in a high conflict custody case not to:

delude themselves into thinking that they are hearing a child’s voice when, in fact, they may be receiving a distorted broadcast laced with the static of a charged emotional atmosphere; or the voice may be delivering a script written by another; or it may reflect the desire to placate, take care of, or pledge loyalty to a parent. (P. 382.)

Warshak expressed concern with the “enlightenment rationale” approach to child custody: meaning empowering the child with decision-making status when it comes to custody and the parenting schedule. Warshak states:

The basic pitfall with the enlightenment rationale is that we will confuse what children tell us with what is in their best interest. Some evaluators, advocacy groups, and parents (particularly those whose children support their position in the custody dispute) assume that children’s words always express their genuine thoughts and feelings,

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and they equate children's thoughts and feelings with expressions of their true best interests. That is, children know and are accurate reporters of what is best for them. Proponents of this position believe that a child's strong preference for or aversion to a parent should weigh heavily in custody decisions. In this view, any child's rejection of a parent is prima facie evidence of severe maltreatment by the rejected parent. (P. 374.)

A 2013 article by Jaime Rosen entitled "The Child's Attorney and the Alienated Child: Approaches to Resolving the Ethical Dilemma of Diminished Capacity," was written to aid the Attorney for the Child to override the "client centered model" of representation in favor of the "best interests of the child model" in cases of parental alienation. Rosen argues that the lawyer for the child may substitute judgment if the child client exhibits diminished cognitive capacity as a result of a brainwashing. In recognition of the alienating parent's influence over the child, Rosen states:

The ABA [*American Bar Association*] Standards also recognize that children are susceptible to intimidation and manipulation and the child's decisions may not reflect the child's actual position...The attorney also has a duty to prevent the child client from pursuing decisions that would not be made but for the brainwashing techniques employed by the alienating parent.

Under the influence of an alienating parent, the child may not be cognitively or psychologically able to make a judgment that is in his or her best interests.

The child's attorney must determine whether the child's wishes and statements are an authentic reflection of the child's attachment with each parent or instead, a result of one parent's efforts to contaminate the child's feelings toward the other parent as a result of programming or scripting.

In cases of parental alienation, the parental brainwashing of the child is the true culprit. The child's opinion is replaced with the desires and objectives of the parent who exercises the most influence over him or

her. Further, as more weight is accorded to the child's stated preferences, the risk of manipulation or pressure by a parent increases. (Pp. 333-334, 336.)

The susceptibility of children to adult influence is not a new notion. But it is not generally recognized that a parent, who is presumed to pursue her or his child's best interests, could, instead, employ behavior to use her or his child as ammunition in a battle with the other parent. Nevertheless, the clinical literature abounds with documentation from practices of clinicians and matrimonial attorneys of this all too prevalent behavior. And the literature on these cases further documents the ease with which children succumb to parental manipulation—even to the point of engaging in fabrication, deception, and maltreatment of their targeted/rejected parent. (Bernet, 2010; Lorandos, Bernet, Sauber, 2013; Gardner, Sauber, Lorandos, 2003; Baker & Fine, 2007; Gottlieb, 2012.)

In summation, it is my professional opinion that the child of high conflict, adversarial parental legal proceedings needs to be extricated from the triangulation process. We must eschew our traditional approach in these situations to inquire of the child as to her or his wishes regarding family relationships, living arrangements, and parenting schedules. Instead, the professionals who intervene in this area must make these momentous family decisions. These professionals are charged with shielding children from the oppressive situation of having to offer their uninformed, misguided, and frequently influenced wishes. The Reference list at the end of this Amicus Brief cites several research studies about the deleterious effects to child of Adverse Childhood Experiences (ACE)—of which family dysfunction is one such experience.

We must recognize that the standard for shared parental responsibility and access is in the child's best interests as long as each parent is fit and is willing to assure the relationship with the other parent. And when determining the parenting plan with the nonresidential parent, it should be decided exclusively upon an assessment of that parent's competency, commitment, availability, intentions, and desires to parent the child and not upon the child's wishes.

I am enclosing with this Amicus Brief my Professional Resume/ Curriculum Vitae (CV). Please feel free to contact me with any questions.

Respectfully signed, notarized and submitted in the case of *Plaintiff v Defendant*

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Linda J. Gottlieb, LMFT, LCSW-R  
*Licensed Marriage & Family Therapist, Licensed Clinical Social Worker,  
Public Speaker, and Author*  
Member of American Association for Marriage and Family Therapy

BEFORE ME, the undersigned Notary Public, on this day personally appeared LINDA J. GOTTLIEB, who being by me duly sworn, on her oath deposed and said that she is an amicus curiae in the above entitled and numbered cause; that she has read the above and foregoing amicus brief, and that every statement contained therein in within her personal knowledge and is true and correct.

SUBSCRIBED AND SWORN TO BEFORE ME, on this the \_\_\_\_\_ day of \_\_\_\_\_, 2016 by Linda J. Gottlieb, LMFT, LCSW-R.

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